Law Offices of Alexander Heckscher
305 Broadway 7th Floor New York, NY 10007
1-212-323-6895
Alex@HeckscherLaw.com / www.HeckscherLaw.cos
NY & NJ

February 19, 2025

## Via ECF

Hon. Katharine H. Parker Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: *Yang et al. v. Fei et al.*, 24-cv-05055 (RA-KHP)

Dear Judge Parker:

We write jointly pursuant to Your Honor's Post-Conference Order, Dkt. 56, to provide a status update on this matter.

1. Status of discovery progress thus far

Initial Discovery Requests: Plaintiffs served their first set of discovery requests on January 20, 2025. Defendants' responses are due on February 19, 2025. The appearing Defendants have indicated that they will need an extension of time to respond to such requests. In addition, the appearing defendants will issue written discovery demands within the next two weeks. The counsel for the Plaintiffs is considering whether to grant the extension. A telephonic conference may be required if counsel for the parties cannot reach resolution.

2. Settlement discussions and prospects of settlement

Current Status: The parties have broached the topic of settlement but have not yet had significant settlement discussions. The counsel for the Plaintiffs is not prepared to schedule a settlement conference at this time.

Respectfully submitted,

/s/ Alexander Heckscher
Alexander Heckscher
Law Offices of Alexander Heckscher, Esq.
305 Broadway, 7F, Suite 88 New York, NY 10007
(202) 323-6895

alex@heckscherlaw.com

Times Wang (admitted pro hac vice)

## Case 1:24-cv-05055-RA-KHP Document 60 Filed 02/19/25 Page 2 of 2

Law Offices of Alexander Heckscher
305 Broadway 7th Floor New York, NY 10007
1-212-323-6895
Alex@HeckscherLaw.com / www.HeckscherLaw.com
NY & NJ

Farra & Wang PLLC 1300 I Street NW, Suite 400E Washington, DC 20005 (202) 505-6227 twang@farrawang.com

Counsel for plaintiffs

Aleksander Boleslaw Milch The Kasen and Liu Law Firm, PLLC 136-33 37th Avenue Ste 9c Flushing, NY 11354 718-337-8012 aleksander@kasenlawfirm.com

Counsel for defendants: Yurong Hu, Qilong Liu, Wenling Wang, Yun Ye, Nan Zheng, and Xiaona Zhou.